

REMARKS

Claims 1 through 20 are currently pending in the application.

Claims 1 through 20 currently stand rejected.

This amendment is in response to the Office Action of April 17, 2003.

Claims 1, 2, 6 through 10, and 13 through 20 were rejected under 35 U.S.C. § 102(b) as being anticipated by Sehr (U.S. Patent No. 6,085,976).

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicants have amended the claimed invention to clearly distinguish over the cited prior art.

Applicants submit that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Applicants submit that presently amended independent claims 1, 9, and 17 are not anticipated by Sehr because Sehr does not describe, either expressly or inherently, each and every element of the claimed invention in as complete detail as is contained in the presently amended independent claims 1, 9, and 17. For instance, Sehr does not either expressly or inherently describe the elements of the presently claimed invention of presently amended independent claims 1, 9, and 17 calling for "providing user information at a first location in said network using an input device at said first location in said network", "printing said data using any printer at any second location in said network different than said first location in said network", "a processor located at a first location in said network", "printing of said data at any printer located at a second location in said network different than said first location of said processor", "a computer located at a first location operably coupled to an external peripheral device to form a network having a plurality of computers and having a plurality of printers connected thereto", and "printing of said data at any printer located at a second location in said network different than said first location of said computer". At best, the Sehr reference only explicitly describes the use of a printer for printing a travel ticket based on accessing data at the location where the data is input using a computer, not the presently claimed invention of using a first location in the network for the

input of the data and a second location in the network for printing of the data. Neither does Sehr inherently describe the elements of the presently claimed invention because Sehr only has a single location of printing a travel ticket at the same location associated with the computer used to input data for creating the access card.

Therefore, Sehr cannot and does not anticipate under 35 U.S.C. § 102 the elements of the presently claimed invention. Accordingly, presently amended independent claims 1, 9, and 17 are allowable as well as dependent claims 2 through 8, 10 through 16, and 18 through 20 therefrom.

Claims 3 through 5, 11 and 12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sehr (U.S. Patent 6,085,976) in view of Colgate, Jr. (U.S. Patent 5,786,587).

Applicants further submit that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

Applicants submit that any combination of the cited prior art fails to teach or suggest the claim limitations of the presently amended independent claims 1, 9, and 17 as set forth herein to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed invention. More specifically, Applicants submit that any combination of the cited prior art Sehr and Colgate, Jr. does not and cannot teach or suggest the claim limitations of the presently claimed invention calling for “providing user information at a first location in said network using an input device at said first location in said network”, “printing said data using any printer at any second location in said network different than said first location in said network”, “a processor located at a first location in said network”, “printing of said data at any printer located at a second location in said network different than said first location of said processor”, “a computer located at a first location operably coupled to an external peripheral device to form a network having a plurality of computers

and having a plurality of printers connected thereto “, and “printing of said data at any printer located at a second location in said network different than said first location of said computer”.

Applicants further submit that such claim limitations are not taught or suggested by any combination of Sehr and Colgate, Jr. because the cited prior art does not teach or suggest any entry of data and printing at a printer except at the same location of the input device and its associated printer. Additionally, any rejection of the presently claimed invention based upon such cited prior art would be a hindsight reconstruction of the Applicant's invention based solely upon the Applicant's disclosure as the cited prior art does not contain any such teaching or suggestion. Such a hindsight reconstruction is neither within the ambit nor purview of 35 U.S.C. § 103, clearly impermissible, and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 because the suggestion is not within the cited prior art.

Accordingly, claims 1 through 20 are allowable over any combination of Sehr and Colgate, Jr. under 35 U.S.C. § 103.

Applicants request entry of this amendment for the following reasons:

The amendment is timely filed.

The amendment clearly places the application in condition for allowance.

The amendment does not require any further consideration or search as the cited prior art has been considered in detail in both rejections in the application.

In summary, Applicants submit that claims 1 through 20 are clearly allowable over the cited prior art.

Serial No. 09/973,253

Applicants request entry of this amendment, the allowance of claims 1 through 20,
and the case passed for issue.

Respectfully submitted,



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Date: June 13, 2003
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Document in ProLaw